

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Tamika M. Wilson	:	Chapter 13
	:	
	:	
	:	
Debtor	:	Case No.: 20-11525-AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Tamika M. Wilson, by and through her undersigned counsel, hereby moves to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about March 11, 2020.
2. The Chapter 13 filing was assigned case number 20-11525-AMC.
3. On or about April 27, 2021, the Debtor's Chapter 13 Plan was confirmed by this Honorable Court.
4. On or about December 2020, Debtor was involved in an automobile accident in which her vehicle was totaled.
5. As a result of the automobile accident, Debtor wishes to surrender the 2013 Kia Optima, which is currently being paid inside the confirmed plan, to the creditor.
6. The Debtor's proposed modified Chapter 13 Plan, attached hereto as **"Exhibit A"**, is currently affordable by the Debtor.

WHEREFORE, the Debtor requests that he be permitted to modify her Chapter 13 Plan for the above stated reasons.

Dated: May 6, 2021

/s/Brad J. Sadek, Esq
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